

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
In re:	:	Chapter 11
	:	
Charter School Capital, Inc., ¹	:	Case No. 25-11016 (CTG)
	:	
Debtor.	:	
	:	
	X	

DEBTOR’S WITNESS AND EXHIBIT LIST FOR HEARING ON JULY 2, 2025

The above-captioned debtor and debtor in possession (the “Debtor”) hereby submits this witness and exhibit list (the “Witness and Exhibit List”) for the hearing scheduled for **July 2, 2025 at 11:00 a.m. (E.T.)** (the “Hearing”) before the Honorable Craig T. Goldblatt at the United States Bankruptcy Court for the District of Delaware, located at 824 N. Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801.

WITNESSES

The Debtor may, if necessary, seek to call the following witness:

- a) Brian Ayers, Managing Director of Rock Creek Advisors, LLC.

EXHIBITS

The Debtor may, if necessary, seek to introduce the following exhibit at the Hearing.

No.	Description	Docket No.
1.	Initial DIP Budget	57-1

¹ The Debtor’s mailing address is 9450 SW Gemini Dr., PMB 559064, Beaverton, OR, 97008-7105, and the last four digits of the Debtor’s federal tax identification number are 4278.

RESERVATION OF RIGHTS

The Debtor reserves all rights, including but not limited to the right to amend, revise, supplement, or withdraw this Witness and Exhibit List at any time, to designate additional witnesses and exhibits, to call or cross examine any person identified as a witness by any other party in interest or introduce any document identified as an exhibit by any other party in interest, and to offer additional witnesses and exhibits at the Hearing for purposes of impeachment or rebuttal, in response to witnesses and evidence offered by any other party, and for any other permissible purpose under the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Federal Rules of Evidence. The Debtor also reserves the right to amend this Witness and Exhibit List at any time prior to the Hearing, including, without limitation, in the event of the filing of any objections, responses, replies, supplemental declarations, or other filings in connection with the Hearing.

The Debtor further reserves the right to ask the Court to take judicial notice of pleadings, transcripts, and/or documents filed in or in connection with the above-captioned cases, to offer rebuttal exhibits, and to modify, supplement, or amend this Witness and Exhibit List at any time prior to or during the Hearing. Designation of any exhibit above does not waive any objections the Debtor may have to any exhibit listed on any party's exhibit list or introduced at the Hearing.

[Signature Page Follows]

Dated: June 30, 2025
Wilmington, Delaware

POTTER ANDERSON & CORROON LLP

/s/ James R. Risener III

Aaron H. Stulman (No. 5807)
Brett M. Haywood (No. 6166)
James R. Risener III (No. 7334)
Ethan H. Sulik (No. 7270)
1313 North Market Street, 6th Floor
Wilmington, Delaware 19801
Tel: (302) 984-6000
Facsimile: (302) 658-1192
Email: astulman@potteranderson.com
bhaywood@potteranderson.com
jrisener@potteranderson.com
esulik@potteranderson.com

- and -

GOODWIN PROCTER LLP

Howard S. Steel (admitted *pro hac vice*)
Stacy Dasaro (admitted *pro hac vice*)
Kizzy L. Jarashow (admitted *pro hac vice*)
James Lathrop (admitted *pro hac vice*)
The New York Times Building
620 Eighth Avenue
New York, New York 10018-1405
Tel: (212) 813-8800
Facsimile: (212) 355-3333
Email: hsteel@goodwinlaw.com
sdasaro@goodwinlaw.com
kjarashow@goodwinlaw.com
jlathrop@goodwinlaw.com

Proposed Counsel for Debtor and Debtor-in-Possession